

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OMAR MALCOLM, KARVEN ALCINDOR, ANTHONY APONTE, SHIRLENE BLAIR, DERYCK CHARLES, LATIF CORNELIUS, LANAEC CURRY, JOSE DEJESUS, SHAKIYNA ESPINO, ROBERTO FERNANDEZ, VLAJEMY FRANCOIS, CRYSTAL GARNETT, CHANTEL GOUVEIA, APRIL HERNEY-KOSAKOWSKI, TAMELLE HILLIARD, YOLANDA HOLMES, MONIQUE JOHNSON, KEYSHA LEWIS, CAROLYN MARAJ, HUZIRAN MOZEB, ZIHUI PU, DAVID RUDDOCK, MYRLINE ULYSSES, and BRICE WILLIAMS, individually and on behalf of all others similarly situated,

Civil Action No.:  
20-CV-09641(ALC)

**DECLARATION  
IN SUPPORT**

Plaintiffs,

-against-

THE CITY OF NEW YORK,

Defendants.

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I, Yale Pollack, declare under penalty of perjury, and pursuant to 28 U.S.C. §1746, that the following is true and accurate:

1. I am the principal of the Law Offices of Yale Pollack, P.C., who serves as co-counsel for Plaintiffs in the above-referenced action. As such, I have personal knowledge of the facts set forth herein.

2. I graduated Touro Law School in 2006 and have had my own practice since 2015. Since I opened my practice in 2015, I have primarily practiced employment law on the plaintiff side.

3. I am requesting a billing rate of \$500 per hour.

4. Since creating my own firm over nine years ago, I have litigated and settled numerous wage and hour action cases brought under the FLSA and the NYLL. *See, e.g., Melendez*

*v. Eden Palace, Inc.*, 2022 U.S. Dist. LEXIS 159604 (E.D.N.Y Sept. 2, 2022); *Correa v. Garzon & Bernal Design, Inc.*, 2022 U.S. Dist. LEXIS 155040 (E.D.N.Y Aug. 29, 2022); *Garcia v. Progressive Maint. LLC*, 2021 U.S. Dist. LEXIS 90918 (E.D.N.Y. May 11, 2021).

5. My firm incurred over twenty (20) hours of time on this matter as evidenced by the billing records on this file. *A copy of the billing records is attached hereto as Exhibit “I.”*

6. I declare under penalty of perjury that the foregoing is true and accurate.

Dated: July 1, 2024  
Syosset, New York

/s/ Yale Pollack  
**YALE POLLACK**